

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PETER A. CRAWFORD,

Plaintiff,

v.

Civil Action No.
05-cv-10078 (DPW)

WOLVERINE, PROCTOR & SCHWARTZ, INC.,
STEVEN F. CHILINSKI, and
DEEPAK S. KULKARNI,

Defendants.

**DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE
OPPOSITION TO PLAINTIFF'S CURRENTLY PENDING MOTION TO STRIKE
PORTIONS OF THE AFFIDAVIT OF DEEPAK S. KULKARNI**

NOW COMES the Defendants in the above-captioned action and move for an order extending the time for the defendants to file an opposition to plaintiff's currently pending motion to strike portions of the affidavit of Deepak S. Kulkarni to Friday, April 28, 2006. Plaintiff has consented to the extensions defendants seek herein and will not oppose this motion.

Plaintiff's currently pending motion to strike was filed on April 6, 2006. Pursuant to the Court's scheduling note issued on April 14, 2006, a hearing on all pending motions in this action, including plaintiff's motion to strike, has been set for June 28, 2006. The extension sought by this motion will not alter the hearing date for plaintiff's motion to strike.

Pursuant to Local Rule 7.1(B)(2), opposition to plaintiff's motion to strike was originally due on April 20, 2006. The defendants now ask the Court to move this deadline to April 28, 2006.

WHEREFORE, defendants respectfully move this Court to grant the defendants an extension of time until April 28, 2006 to submit their opposition papers to plaintiff's currently pending motion to strike.

Respectfully submitted,

PETER A. CRAWFORD,

WOLVERINE, PROCTOR & SCHWARTZ,
INC.; DEEPAK S. KULKARNI and STEVEN
CHILINSKI,

Plaintiff *Pro Se*

By their attorneys,

/s/ Peter A. Crawford
23 Newcastle Drive
Nashua, New Hampshire 03060
(603) 888-4574

/s/ Jeffrey D. Kuhn
Mark M. Whitney
Jeffrey D. Kuhn
MORGAN, BROWN & JOY, LLP
200 State Street – 11th Floor
Boston, Massachusetts 02109-2605
(617) 523-6666
Counsel for Defendants

Dated: April 19, 2006

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 20, 2006, I filed the foregoing document using the Court's ECF system. I further certify that on that same date I mailed the foregoing document to the pro se plaintiff, Peter A. Crawford, 23 Newcastle Drive, #11, Nashua, NH 03060, by U.S. Mail; I further certify that I sent a courtesy copy of this document to Mr. Crawford at his email address petercra@ix.netcom.com on the same date.

/s/ Jeffrey D. Kuhn
Jeffrey D. Kuhn, Esq.